

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

JPMORGAN CHASE & CO.,)	
JPMORGAN CHASE BANK, N.A. and)	
JPMORGAN CHASE ELECTRONIC)	
FINANCIAL SERVICES, INC.,)	
)	C. A. No. 08-189-SLR
Plaintiffs,)	
)	
v.)	JURY TRIAL DEMANDED
)	
AFFILIATED COMPUTER SERVICES, INC. and)	
ACS STATE & LOCAL SOLUTIONS, INC.,)	
)	
Defendants.)	

STIPULATION AND ORDER

WHEREAS, the parties are aware of the Default Standard for Discovery of Electronically Stored Information developed by the Ad Hoc Committee for Electronic Discovery;

WHEREAS, the parties are currently negotiating the terms of electronic discovery in the current action; and

WHEREAS, the Default Standard for Discovery of Electronically Stored Information requires certain statements of compliance to be filed with the court.

IT IS HEREBY STIPULATED AND AGREED, by and between the parties hereto, through their respective counsel and subject to the approval of the Court, that all deadlines contained in the Default Standard for Discovery of Electronically Stored Information are not, at this time, applicable to this action. The parties shall have until September 15, 2008 to reach an agreement regarding electronic production of documents.

POTTER ANDERSON & CORROON LLP

/s/ Philip A. Rovner

Philip A. Rovner (DE Bar No. 3215)
provner@potteranderson.com
1313 N. Market Street
P.O. Box 951
Wilmington, Delaware 19801
(302) 984-6000 (main)
(302) 658-1192 (fax)

Of Counsel:

Scott L. Robertson
Stephen T. Schreiner
Jennifer A. Albert
Thomas J. Scott, Jr.
Eleanor M. Hynes
Matthew C. Osborne
Goodwin Proctor LLP
901 New York Avenue, NW
Washington, D.C. 20001
Telephone: (202) 346-4000

Attorneys for Plaintiffs
JP Morgan Chase & Co.,
JP Morgan Chase Bank, N.A., and
JP Morgan Chase Electronic Financial
Services, Inc.

Dated: September 3, 2008

SO ORDERED, this _____ day of September, 2008.

CONNOLLY BOVE LODGE & HUTZ LLP

/s/ Kevin F. Brady

Collins J. Seitz, Jr. (DE Bar No. 2237)
cseitz@cblh.com
Kevin F. Brady (DE Bar No. 2248)
kbrady@cblh.com
1007 North Orange Street
P.O. Box 2207
Wilmington, DE 19899
(302) 658-9141 (Main)
302-656-0116 (fax)

Of Counsel:

Mike McKool
Lewis T. LeClair
Douglas A. Cawley
McKool Smith, P.C.
300 Crescent Court, Suite 1500
Dallas, Texas 75201
Telephone: (214) 978-4000

Brett E. Cooper
399 Park Avenue, Suite 3200
New York, New York 10022
Telephone: (212) 402-9400

Attorneys for Defendants
Affiliated Computer Services, Inc., and
ACS State & Local Solutions, Inc.

The Honorable Sue Robinson
United States District Court

CERTIFICATE OF SERVICE

I hereby certify that on September 3, 2008, I caused a true and correct copy of the foregoing document to be served by email to counsel of record as follows:

Philip A. Rovner, Esquire Potter Anderson & Corroon LLP 1313 North Market Street P.O. Box 951 Wilmington, DE 19899-0951 provner@potteranderson.com	Stephen T. Schreiner, Esquire Goodwin Procter 901 New York Avenue, N.W. Washington, DC 20001 SSchreiner@goodwinprocter.com
---	---

/s/ Kevin F. Brady.

Kevin F. Brady (Bar No. 2248)

kbrady@cblh.com